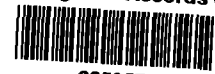




UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

I.1
2-14-2005
EPA Region 5 Records Ctr.



225957

FEB 14 2005

REPLY TO THE ATTENTION OF:
SE-5J

VIA FACSIMILE (847) 295-3185 & (312) 658-0576 AND U.S. MAIL

Mr. Tim Grogan
Vice President
Residential Homes of America, Inc.
37 Sherwood Terrace, Suite 112
Lake Bluff, Illinois 60044

RE: 160 East Illinois - Kieffer Building, Chicago, Illinois

Dear Mr. Grogan:

The purpose of this letter is to confirm our discussion on February 11, 2005 regarding disposal of the demolition debris at the above-referenced location. U.S. EPA requests that you perform radiation screening of each backhoe or excavator bucket of the demolition debris prior to removal from the demolition site. We are requesting this screening for the following reasons:

1. Your building's immediate proximity to the Lindsay Light Building (AKA Lindsay Light I, 161 East Grand);
2. Elevated gamma levels in the alley between your building and 161 East Grand;
3. Your building was a warehouse at the time Lindsay Light was one of the world's largest manufacturers of thorium mantles and Lindsay raw materials or products may have been stored in the building; and
4. The most recent correspondence from Mark Goodman & Associates, to U.S. EPA, States that "[w]e will contact you if changes are made in the building ...". A copy of this letter is enclosed. You explained when we met you on February 11 that although Mark Goodman & Associates is no longer the sole owner, Mark Goodman & Associates still retained an ownership interest in the 160 E. Illinois property.

In order to perform this radiation screening, we recommend that you create a reference bucket of non-radiologically-contaminated bricks to establish debris background readings for radiation survey instruments. Buckets of debris exceeding either: 1) two times the debris background, or 2) 50 microroentgens per hour at any accessible point, should then be segregated and managed for further investigation and consultation with U.S. EPA. Also, all demolition and debris management work should be performed as required by OSHA regulations, including those published in 29 CFR 1910 and 1926. Specifically, we expect use of Personal Air Monitors (PAMs) for demolition and debris management workers, and site airborne radionuclide monitoring for the public/pedestrians.

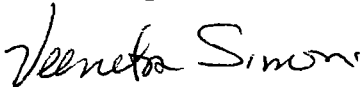
Before initiation of debris management activities, please fax a copy of your debris management plan to U.S. EPA. The debris management plan should provide details regarding radiological screening, segregation and debris staging procedures, and details regarding the removal, transportation and disposal of the debris, including disposal and/or recycling locations. The debris management plan should additionally provide details on the site airborne radionuclide monitoring, and summarize dosimetry and personnel monitoring of demolition and debris management workers.

Upon initiation of debris removal activities, a summary of daily debris management activities should be faxed to U.S. EPA by 9am the following day. A report on the demolition debris management activities, including details regarding debris disposition, should be provided to U.S. EPA within 7 days after completion of debris removal activities. U.S. EPA should also be contacted immediately upon completion of debris removal for inspection of the building foundation and surrounding area.

Prior to proposing this method, we checked with CID Landfill because Brandenburg mentioned CID as one of the possible final disposal locations. CID informed us that they do not use a portable radiation monitor for construction and debris (C&D) waste.

If you have any questions regarding this correspondence or use gamma spectroscopy, please contact me at (312) 886-3601 or Eugene Jablonowski at (312) 886-4591.

Sincerely,



Verneta Simon
On-Scene Coordinator

Enclosures:

1. Letter dated January 6, 2003 from Radiation Safety Services, Inc. to U.S. EPA, regarding 160 East Illinois
2. Letter dated August 20, 2002 from U.S. EPA to Mr. Troy Imke, Mark Goodman & Associates, and Ms. Laurie Bain, Bain Environmental, regarding 160 East Illinois

cc: Richard Berggreen, GeoSyntec Consultants, w/o enclosures

bcc: Gregg Dempsey, USEPA Radiation & Indoor Environments, Las Vegas,
Nevada, w/o enclosures
Mary Fulghum, C-14J, w/o enclosures
Charles Gebien, SE-5J, w/o enclosures
Eugene Jablonowski, SR-6J, w/o enclosures
Larry Jensen, SE-5J, w/o enclosures
Cathy Martwick, C-14J, w/o enclosures
Debbie Regel, SE-5J, w/o enclosures
Stuart Walker, USEPA HQ, 5202G, w/o enclosures